

August 15, 2018 Project No. 013-6052-014

Debra Rossi, Remedial Project Manager USEPA Region 3 1650 Arch Street, 3HS21 Philadelphia, PA 19103-2029

RE: MONTHLY PROGRESS REPORT – JULY 2018 REPORTING PERIOD DELAWARE SAND & GRAVEL SUPERFUND SITE NEW CASTLE COUNTY, DELAWARE

Dear Ms. Rossi:

Golder Associates Inc. (Golder) prepared this monthly progress report on behalf of the Respondents for the Delaware Sand & Gravel (DS&G) Superfund Site (Site) in satisfaction of the requirements of Paragraph 4.1 of the Remedial Design Statement of Work (RD SOW) included as Appendix B of the Administrative Settlement Agreement and Order on Consent for Remedial Design (RD AOC; Docket No. CERCLA-03-2018-0116DC) executed by the United States Environmental Protection Agency (USEPA) on May 22, 2018 and effective May 29, 2018 (Settlement). (Although Paragraph 4.1 of the RD SOW does not require submission of the monthly progress report until after USEPA's approval of the Remedial Design Work Plan (RDWP), Respondents have elected to make such submissions on a monthly basis by the 15th of the month.) The following sections provide a summary of the required reporting items under the Settlement for the above-referenced reporting period. For completeness, Section 2 summarizes activities performed during the reporting period under the 1993 Consent Decree for the Site and those anticipated during the next reporting period.

#### 1.0 2018 RD AOC

## 1.1 Actions Toward Achieving Compliance with Settlement<sup>1</sup>

- Continued preparation of Pre-Design Investigation Work Plan (PDIWP) as described in RD SOW Paragraph 3.3(a) due to USEPA on or before August 18, 2018
- Initial preparation of the RDWP as described in Paragraph 3.1 of the RD SOW due to USEPA on or before September 17, 2018
- Monthly conference call (pursuant to Section VII, Paragraph 13.a.3. of the RD AOC) on July 25, 2018 with USEPA, Project Coordinator and Supervising Contractor USEPA agreed PFAS groundwater sampling event could be delayed until April 2019

## 1.2 Data Received and/or Generated

No data was received or generated under this Settlement during the reporting period

Golder Associates Inc.

200 Century Parkway, Suite C Mt. Laurel, New Jersey, USA 08054

T: +1 (856) 793-2005 F: +1 (856) 793-2006

golder.com

<sup>&</sup>lt;sup>1</sup> Paragraph 4.1(e) of the RD SOW requires "[i]nformation regarding the percentage of completion" be included in the monthly progress reports. This information will be included in future progress reports after USEPA's approval of the RDWP.

August 15, 2018

## 1.3 Deliverables Submitted to USEPA

No deliverables were submitted under this Settlement during the reporting period

## 1.4 Activities Scheduled for Next Six Weeks (through Mid-September 2018)

- Final preparation of the PDIWP and submittal to USEPA on or before August 18, 2018
- Continued preparation of the RDWP due to USEPA on or before September 17, 2018
- Monthly conference call (pursuant to Section VII, Paragraph 13.a.3. of the RD AOC) on August 23, 2018 with USEPA, Project Coordinator and Supervising Contractor
- Preparation of addenda to existing access agreements. New access agreements are not anticipated at this time
- All Respondents have submitted their financial assurance instruments pursuant to Paragraph 80 of the RD AOC.

# 1.5 Unresolved Delays Encountered and/or Anticipated and Efforts to Mitigate Those Delays

No delays were encountered and/or are anticipated at this time which may affect the future schedule

# 1.6 Proposed and/or Approved Modifications to Work Plans and/or Schedules<sup>2</sup>

- No work plans have been submitted under the RD SOW to date
- There are no proposed or approved modifications to the RD SOW schedule at this time

# 1.7 Community Involvement Plan<sup>3</sup> (CIP) Activities

At this time, the USEPA has not requested the participation of the Respondents in community involvement activities

#### 2.0 ACTIVITIES UNDER 1993 CONSENT DECREE

## 2.1 Performed During Reporting Period

## 2.1.1 Groundwater Monitoring

- Continued preparation of Semi-Annual Groundwater Monitoring Report for January through June 2018 due on or before August 29, 2018
- Monitoring of transducers in 10 monitoring wells to observe AWC Llangollen wellfield operations

<sup>&</sup>lt;sup>3</sup> Per Paragraph 2.1(a) of the RD SOW: "In 1984, EPA developed a Community Involvement Plan (CIP) for the Site; EPA updated the CIP in 2017. Pursuant to 40 C.F.R. § 300.435(c), EPA shall review the existing CIP and determine whether it should be revised to describe further public involvement activities during the Work that are not already addressed or provided for in the existing CIP."



<sup>&</sup>lt;sup>2</sup> Per Paragraph 4.2 of the RD SOW, "If the schedule for any activity described in the Progress Reports, including activities required to be described under Paragraph 4.1(d), changes, Respondents shall notify EPA of such change at least seven days before performance of the activity."

## 2.1.2 Landfill Inspections, LFG Monitoring and Mitigation System OM&M

- Preparation of Second Quarter 2018 Inspection and Landfill Gas Monitoring Report
- Continued OM&M of LFG Mitigation System
- Continued efforts toward switch from flare to direct-venting system in anticipation of DNREC air permit approval

## 2.2 Scheduled for Next Reporting Period (August 2018)

# 2.2.1 Groundwater Monitoring

- Continued preparation of Semi-Annual Groundwater Monitoring Report for January through June
  2018 (due on or before August 29, 2018)
- Tentative schedule to perform the bi-monthly (every other month) groundwater monitoring of four monitoring points upgradient of AWC well G3R on August 9, 2018
- Monitoring of transducers in 10 monitoring wells to observe AWC Llangollen wellfield operations

# 2.2.2 Landfill Inspections, LFG Monitoring and Mitigation System OM&M

- Submittal of Second Quarter 2018 Inspection and Landfill Gas Monitoring Report
- Continued OM&M of LFG Mitigation System
- Continued efforts toward switch from flare to direct-venting system in anticipation of DNREC air permit approval

If there are any questions regarding this progress report, please do not hesitate to contact the undersigned.

Very truly yours,

Golder Associates Inc.

Theresa A. Miller, LSP, PG

Sheep a. Miller

Senior Consultant

TAM/bjb

cc: (via email) C. Wirtz, DNREC

- D. Sutton, HGL
- S. Mays, DS&G Trust

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